

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

JAMAAL RUSS

Plaintiff,

**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT**

-against-

DARRELL CHAVERS,

Defendant.

10 CV 1370 (SLT)(JO)

**PLEASE TAKE NOTICE** that upon the annexed Local Civil Rule 56.1 Statement dated July 11, 2012; the annexed Local Rule 56.2 Notice to Pro Se Litigant; the Declaration of Special Assistant Corporation Counsel Joshua J. Lax dated July 11, 2012, and the exhibits annexed thereto; the accompanying Defendant Detective Darrell Chavers' Memorandum of Law in Support of his Motion for Summary Judgment; and upon all prior pleadings and proceedings had herein, defendant Detective Darrell Chavers will move this Court before the Honorable Sandra L. Townes, United States District Judge, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, at a date to be determined by the Court, for summary judgment in favor of defendant Detective Darrell Chavers pursuant to Rule 56 of the Federal Rules of Civil Procedure on the grounds that there are no material issues of fact in dispute that warrant a trial and that defendant Detective Chavers is entitled to judgment as a matter of law, and for such other and further relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Court's June 22, 2012 Order, opposition papers, if any, must be served on the undersigned on or before August 8, 2012.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Court's June 22, 2012 Order, reply papers, if any, will be served upon plaintiff and the fully brief motion will be filed with the Court on or before August 22, 2012.

Dated: New York, New York  
July 11, 2012

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